

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

BIG LOTS, INC., *et al.*,

Debtors.<sup>1</sup>

Chapter 11

Case No. 24-11967 (JKS)

Jointly Administered

**Re: D.I. 19**

**CERTIFICATION OF COUNSEL REGARDING INTERIM ORDER UNDER  
BANKRUPTCY CODE SECTIONS 105, 361, 362, 363, 364, 503, 506, 507, AND 552, AND  
BANKRUPTCY RULES 2002, 4001, 6003, 6004, AND 9014 (I) AUTHORIZING  
DEBTORS TO (A) OBTAIN POSTPETITION FINANCING AND (B) USE CASH  
COLLATERAL, (II) GRANTING (A) LIENS AND PROVIDING SUPERPRIORITY  
ADMINISTRATIVE EXPENSE STATUS AND (B) ADEQUATE PROTECTION TO  
PREPETITION SECURED CREDITORS, (III) MODIFYING AUTOMATIC STAY, (IV)  
SCHEDULING A FINAL HEARING, AND (V) GRANTING RELATED RELIEF**

The undersigned counsel to the above-captioned debtors and debtors in possession (the “Debtors”) hereby certifies as follows:

1. On September 9, 2024 (the “**Petition Date**”),<sup>2</sup> the Debtors each filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the “**Bankruptcy Code**”), and related pleadings with the United States Bankruptcy Court for the District of Delaware. The Debtors are debtors in possession pursuant to

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<sup>1</sup> The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors’ corporate headquarters is 4900 E. Dublin-Granville Road, Columbus, OH 43081.

<sup>2</sup> Capitalized terms not defined herein have the meaning ascribed to them in the Motion.

sections 1107(a) and 1108 of the Bankruptcy Code. The automatic stay of Section 362(a) of the Bankruptcy Code is in effect.

2. On the Petition Date, the Debtors filed the *Motion of Debtors for Entry of Interim and Final Orders, Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, 364, 503, 506, 507, and 552 (I) Authorizing the Debtors to (A) Obtain Senior Secured Superpriority Post-Petition Financing and (B) Use Cash Collateral, (II) Granting Liens and Superpriority Administrative Expense Claims, (III) Providing Adequate Protection to Prepetition Secured Parties, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief* (the “**Motion**”) (D.I. 19).

3. At the first day hearing held on September 10, 2024, the Debtors received informal comments from the Office of the United States Trustee (the “**U.S. Trustee**”) certain other parties to the proposed form of interim order attached to the Motion (the “**Proposed Order**”). Further, during the first day hearing, the Court granted the relief requested on an interim basis, with certain modifications to proposed order.

4. Accordingly, the Debtors have revised the form of order granting the relief requested in the Motion (the “**Revised Proposed Order**”), attached hereto as **Exhibit A**. The Revised Proposed Order has been shared with the U.S. Trustee and the parties who provided comments to the proposed order, and the Debtors understand that those parties have no objection to entry of the Revised Proposed Order.

5. A redline comparing the Revised Proposed Order against the Proposed Order is attached hereto as **Exhibit B**.

WHEREFORE, the Debtors request entry of the Revised Proposed Order attached hereto as **Exhibit A**.

Dated: September 10, 2024  
Wilmington, DE

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